

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# Exhibit E

1  
2 IN THE UNITED STATES DISTRICT COURT.  
3 FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

4 -----x  
5 THE SOUTH CAROLINA STATE CONFERENCE  
6 OF THE NAACP

7 and

8 TAIWAN SCOTT, ON BEHALF OF HIMSELF Case No.  
9 AND ALL OTHER SIMILARLY SITUATED 3:21-CV-03302  
10 PERSONS, JMC-TJH-RMG

11 Plaintiffs,

12 Vs.

13 THOMAS C. ALEXANDER, IN HIS OFFICIAL  
14 CAPACITY AS PRESIDENT OF THE SENATE;  
15 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY  
16 AS CHAIRMAN OF THE SENATE JUDICIARY  
17 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL  
18 CAPACITY AS SPEAKER OF THE HOUSE OF  
19 REPRESENTATIVES; CHRIS MURPHY, IN HIS  
20 OFFICIAL CAPACITY AS CHAIRMAN OF THE  
21 HOUSE OF REPRESENTATIVES JUDICIARY  
COMMITTEE; WALLACE H. JORDAN, IN HIS  
OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE  
OF REPRESENTATIVES ELECTIONS LAW  
SUBCOMMITTEE; HOWARD KNAPP, IN HIS  
OFFICIAL CAPACITY AS INTERIM EXECUTIVE  
DIRECTOR OF THE SOUTH CAROLINA STATE  
ELECTION COMMISSION; JOHN WELLS, JOANNE  
DAY, CLIFFORD J. EDLER, LINDA MCCALL,  
AND SCOTT MOSELEY, IN THEIR OFFICIAL  
CAPACITIES AS MEMBERS OF THE SOUTH  
CAROLINA STATE ELECTION COMMISSION,  
Defendants.

22 -----x

23 STENOGRAPHIC REMOTE VIRTUAL DEPOSITION  
24 BREEDEN JOHN  
25 Tuesday, August 9, 2022

1  
2 STATE OF NEW YORK )

3 ss.:

4 COUNTY OF NEW YORK )  
5

6 I, ERICA L. RUGGIERI, RPR and a  
7 Notary Public within and for the State  
8 of New York, do hereby certify:

9 That I reported the proceedings  
10 in the within-entitled matter, and  
11 that the within transcript is a true  
12 record of such proceedings.

13 I further certify that I am not  
14 related by blood or marriage, to any  
15 of the parties in this matter and  
16 that I am in no way interested in the  
17 outcome of this matter.

18 IN WITNESS WHEREOF, I have  
19 hereunto set my hand this 17th day of  
20 August, 2022.

21 

22 -----  
23 ERICA L. RUGGIERI, RPR, CSR, CLR  
24  
25

1 JOHN

2 interest were defined?

3 A. Yes. I guess, you know, to  
4 the extent that I mean, yes.

5 Coastal life-style is different from  
6 life in the upstate, for instance,  
7 in terms economies and recreation  
8 and interests and all that.

9 Q. What about any history of  
10 racial discrimination for people of  
11 African decent?

12 A. Not particularly.

13 Q. Can you describe how  
14 partisan considerations factored  
15 into the development of this plan?

16 A. Primarily didn't want to  
17 significantly change the 1st  
18 District and the 6th District.  
19 Didn't want to make significant  
20 changes to their political leanings  
21 as they were drawn under the  
22 benchmark plan.

23 Q. That was a view shared by  
24 the core redistricting team?

25 A. Yeah.

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

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E R R A T A

I wish to make the following changes, for  
the following reasons:

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